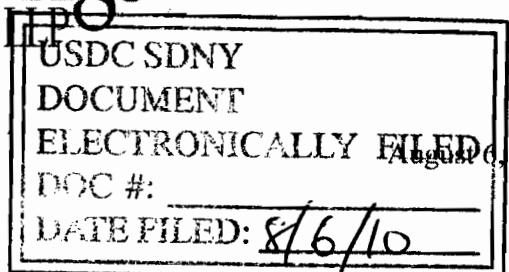


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**Delivered via Email**

Hon. Alvin K. Hellerstein  
United States District Court  
Southern District of New York  
United States Courthouse  
500 Pearl Street, Room 1050  
New York, New York 10007

Re In re September 11 Litigation, 21 MC 101

Dear Judge Hellerstein:

This firm is co-counsel to Joseph & Herzfeld P.C., attorneys for uninsured property damage plaintiffs Barclay Dwyer Co., Inc. ("Barclay"), Tower Computer Services, Inc. ("Tower"), and N.S. Windows LLC ("Windows"). I have today received a copy of the affidavit of Gerald S. Paul, Esq., on behalf of the WTCP Plaintiffs and 7 World Trade Center, LP. In connection with the request of eight uninsured property damage plaintiffs' request for distribution of their settlement proceeds.

I respectfully request an opportunity to respond to Mr. Paul's affidavit by Monday, August 16, 2010. I also request permission to attach to our response copies of the affidavits and other materials that were provided to Mr. Paul, for the Court's *in camera* review.

We had requested that Mr. Paul's clients maintain the confidentiality of the information provided because it contained details of the individual settlement amounts, which remains under seal, and because it contained private financial information concerning our clients, and that is the basis for our request that the Court's inspection be *in camera*.

Thank you for the Court's consideration.

Respectfully submitted,

*Terry Cummings* (7853)  
Terry Cummings (7853)

Copy: All Liaison Counsel

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